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7 Attorney for Plaintiffs,  
8 **SEBRINA ROBERTS**

9  
10 **UNITED STATES DISTRICT COURT OF**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12  
13 SEBRINA ROBERTS, an individual,

14 Plaintiff,

15 v.

16 FCA US LLC, a Delaware Limited  
17 Liability Company, and DOES 1  
18 through 10, inclusive,

19 Defendant.

Case No.: 2:20-cv-01578 KJM-KJN  
(Courtroom 3)

*Assigned to the Hon. Kimberly J.  
Mueller*

20 **STIPULATION AND ~~PROPOSED~~**  
21 **ORDER TO CONTINUE**  
22 **DISCLOSURE OF EXPERT AND**  
23 **REBUTTLE EXPERTS AND FACT**  
24 **AND EXPERT DISCOVERY**  
25 **DEADLINES**

26 Filed: June 29, 2020

27  
28 Plaintiff SEBRINA ROBERTS, ("Plaintiff"), and Defendant FCA US  
LLC (collectively, the "Parties"), by and through their respective counsel of record,  
hereby respectfully apply to this Court for an Order continuing the date for the Parties  
to exchange initial expert witness disclosures and rebuttal expert

1 witnesses, and continuing the date for completion of fact and expert discovery.

2 WHEREAS, the Parties further met and conferred pursuant to FRCP Rule  
3 26(f) on June 9, 2021, to consider the nature and basis of the claims and defenses, the  
4 possibilities for promptly settling or resolving the case, and discussing the status of  
5 discovery, and developing a reasonable discovery plan with the goal of continuing  
6 settlement discussions and scheduling a Court-sponsored settlement conference in  
7 mid-August 2021; WHEREAS, the Parties' Initial Expert Witness Disclosures  
8 pursuant to FRCP Rule 26(a)(2) are currently due on July 8, 2021.

9 WHEREAS, the Parties' Rebuttal Expert Witness Disclosures are  
10 currently due on August 5, 2021;

11 WHEREAS, the Parties are to complete all fact discovery by July 15,  
12 2021; WHEREAS, the Parties are to complete all expert discovery by September  
13 9, 2021;

14 WHEREAS, in light of the COVID-19 Pandemic and unavailability of  
15 experts for in-person vehicle inspections, the Parties were unable to arrange a Vehicle  
16 Inspection until July 5, 2021.

17 WHEREAS, the Parties have mutually agreed that postponing Initial  
18 Expert Disclosures and related deadlines, and extending the completion date for fact  
19 and expert discovery until a date sufficiently after this vehicle inspection has occurred  
20 will allow the Parties additional opportunities to discuss settlement and to avoid  
21 potentially unnecessary litigation costs;

22 WHEREAS, no trial date has yet been set in the case;

23 WHEREAS, the Parties, subject to this Court's approval, respectfully  
24 request that: the last date for the Parties to serve Initial Expert Witness Disclosures  
25 pursuant to FRCP Rule 26(a)(2) and the last date to disclose Rebuttal Expert Witness  
26 Disclosures be continued twenty-one days; the deadline for the Parties' to complete  
27 fact discovery be continued for thirty-two days; and, that the deadline for the Parties  
28 to complete expert discovery be continued for thirty-two days.

///

1 NOW THEREFORE, the Parties agree and stipulate that: the deadline for  
2 disclosure of expert witnesses pursuant to Fed. R. Civ. P. 26(A)(2) shall be July 29,  
3 2021; the deadline for disclosure of supplemental and rebuttal experts pursuant to  
4 Fed. R. Civ. P. 26(A)(2)(C) shall be August 26, 2021; the deadline for completion of  
5 fact discovery shall be August 16, 2021; and, the deadline for completion of expert  
6 discovery shall be October 11, 2021.

7  
8 IT IS SO STIPULATED.

9  
10  
11 Dated: July 8, 2021

**UNIVERSAL & SHANNON, LLP**

12  
13  
14 By: James P. Mayo

15 JAMES P. MAYO, Esq.  
16 Attorneys for Defendant FCA US  
17 LLC

18  
19 Dated: July 8, 2021

**QUILL & ARROW, LLP**


20  
21 By: Kevin Y. Jacobson

22 Kevin Y. Jacobson, Esq.  
23 Attorneys for Plaintiff  
24 SEBRINA ROBERTS

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Expert Disclosure: July 29, 2021,  
Rebuttal Expert Disclosure: August 26, 2021  
Fact Discovery Completion Deadline: August 16, 2021  
Expert Discovery Completion Deadline: October 11, 2021

IT IS SO ORDERED.

  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE